

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

**In Re: AQUEOUS FILM-FORMING
FOAMS PRODUCTS LIABILITY
LITIGATION**

MDL No. 2:18-mn-2873-RMG

This Document Relates to:

Brock Donnelly v. 3M Company et al., No. 2:20-cv-00209-RMG

Clinton Speers & Gail Speers v. 3M Company et al., No. 2:21-cv-03181-RMG

Kevin Voelker v. 3M Company et al., No. 2:18-cv-03438-RMG

**DEFENDANTS' SECOND OMNIBUS MOTION TO EXCLUDE
PLAINTIFFS' EXPERT TESTIMONY**

Pursuant to Federal Rules of Evidence 702 and Case Management Order Nos. 26-G and 26-J, Defendants' Co-Lead Counsel, on behalf of the *PI Bellwether* Defendants, submit this second omnibus motion to exclude certain testimony from Dr. David MacIntosh, Mr. Anthony Brown, and Mr. Stephen Petty. As set forth in the accompanying memorandum of law, these experts' opinions do not satisfy the standards for the admission of expert testimony. Defendants additionally seek an order regarding expert testimony challenged by Defendants, and considered by this Court, in *City of Stuart*, as described in the accompanying memorandum of law.

Dated: June 17, 2025

Respectfully submitted,

/s/ Brian Duffy

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Defense Co-Leads

CERTIFICATE OF SERVICE

On June 17, 2025, I electronically submitted the foregoing document with the Clerk of Court, using the electronic case filing system of the Court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Brian Duffy
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